

Appln No. 09/688,456

Amdt date June 27, 2005

Reply to Office action of March 25, 2005

REMARKS/ARGUMENTS

Claims 1-71 are presently pending. Claims 1-41 are amended. New claim 71 is added.

Claims 1-70 are rejected under 35 U.S.C. §103(b) as being unpatentable over Whitehouse, U.S. Patent 6,005,945 ("Whitehouse") over Leon, U.S. Patent 6,424,954 ("Leon").

Applicants submit that all of the claims currently pending in this application are patentably distinguishable over the cited references, and reconsideration and allowance of this application are respectfully requested.

Amended independent claim 1 includes, among other limitations, "wherein each of the plurality of cryptographic devices is capable of authenticating any of the plurality of remote users," "wherein each of the plurality of cryptographic devices is capable of processing a VBI printing request from any of the plurality of remote users," and "wherein each of the plurality of cryptographic devices is capable of generating indicia data for transmitting to any of the plurality of remote users." None of the cited references, alone or in combination, disclose or teach the above limitation.

First, there is no disclosure in Whitehouse that "each of the plurality of cryptographic devices is capable of authenticating any of the plurality of remote users." In order to do this, the alleged central computers of Whitehouse need to be "stateless," and include the necessary software to do so. (See, for example, Specification, page 8, lines 28.). Whitehouse does not teach, nor does it suggest, such a capability. Also, as discussed below, each central computer of

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Whitehouse has it's own domain and dedicated users (database, accounts, transactions, etc.) and would not be capable of authenticating "any of the plurality of remote users."

With respect to Leon, the SMD devices (cryptographic devices) of Leon are NOT remote from the users. Rather, each SMD is attached to each user's computer (via an RS 232 cable. See, FIG. 1A and col. 4, lines 1-2). Furthermore, the fact that the central server of Leon is capable of communicating with the SMDs, does not teach or suggest that "each of the plurality of cryptographic devices is capable of authenticating any of the plurality of remote users," because the central server can be considered as only one cryptographic device, at most.

Accordingly, the Whitehouse/Leon combination does not teach "wherein each of the plurality of cryptographic devices is capable of authenticating any of the plurality of remote users."

Second, Whitehouse does not describe "wherein each of the plurality of cryptographic devices is capable of processing a VBI printing request from any of the plurality of remote users." The central computer of Whitehouse includes "a customer database 172 of information about each of the user accounts serviced by the secure central computer 102; and a transaction database 174 for storing records concerning each postage indicium generated by the secure central computer 102 and each postage credit transaction in which funds are added to a user account." (Col. 8, lines 56-63, underlining added.).

Therefore, even if there were more than one central computer in Whitehouse's system, each computer would have it's own domain and dedicated users (database, accounts,

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transactions, etc.) and will not be able to process postage printing from "any of the plurality of remote users."

Regarding Leon, each dedicated SMD connected to each user's computer is responsible for processing postage printing request from that user, and not the central server. The central server (postage server) is for registration, updates, audits, withdrawal, etc. and not for processing postage printing requests from the users. (Col. 12, line 16-26). Since these SMDs are dedicated and attached to each computer, they are not capable of "processing a VBI printing request from any of the plurality of remote users." In fact, by connecting a dedicated tamper proof SMD to each user's PC, Leon teaches away from "wherein each of the plurality of cryptographic devices is capable of processing a VBI printing request from any of the plurality of remote users."

Consequently, the Whitehouse/Leon combination does not teach "wherein each of the plurality of cryptographic devices is capable of processing a VBI printing request from any of the plurality of remote users."

Third, Whitehouse does not disclose "wherein each of the plurality of cryptographic devices is capable of generating indicia data for transmitting to any of the plurality of remote users." Again, even if there were more than one central computer in Whitehouse's system, each computer would have it's own domain and dedicated users (database, accounts, transactions, etc.) and will not be able to generate "indicia data for transmitting to any of the plurality of remote users."

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Similarly, the dedicated and attached SMDs of Leon are not capable of "generating indicia data for transmitting to any of the plurality of remote users." In deed, by connecting a dedicated SMD to each user's PC, Leon teaches away from "wherein each of the plurality of cryptographic devices is capable of generating indicia data for transmitting to any of the plurality of remote users."

Therefore, the Whitehouse/Leon combination does not teach "wherein each of the plurality of cryptographic devices is capable of generating indicia data for transmitting to any of the plurality of remote users." As a result the amended independent claim 1 is patentable in view of the cited references.

Amended independent claim 41 includes, among other limitations, "authenticating any one of the plurality of remote users by any one of the plurality of cryptographic devices," "authorizing any one of the plurality of remote users for secure processing of a value bearing item by any one of a the plurality of cryptographic devices," and "processing value for the value bearing item by any one of the plurality of cryptographic devices." None of the cited references, alone or in combination, disclose or teach the above limitation.

Again, as discussed above, the Whitehouse/Leon combination does not teach or suggest any one of the above limitations. Furthermore, claim 41 includes the additional limitation of "storing a security device transaction data in a memory for ensuring authenticity and authority of one of the plurality of users, wherein the security device transaction data is processed

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by any one of the plurality of cryptographic devices," that is not taught or suggested by the Whitehouse/Leon combination. Consequently, claim 41 is also patentable in view of the cited references.

In short, the independent claims 1 and 41 define a novel and unobvious invention over the cited references. Dependent claims 2-40, and 42-71 are dependent from claims 1 and 41, respectively and therefore include all the limitations of their respective independent claims and additional limitations therein. Accordingly, these claims are also allowable over the cited references, as being dependent from allowable independent claims and for the additional limitations they include therein.

In view of the foregoing amendments and remarks, it is respectfully submitted that this application is now in condition for allowance, and accordingly, reconsideration and allowance are respectfully requested.

Respectfully submitted,
CHRISTIE, PARKER & HALE, LLP

By 
Raymond R. Tabandeh
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